

Exhibit 5

From: Anderson, Sean R.
Sent: Thursday, June 27, 2019 5:33 PM
To: Kerry Mustico; Golinveaux, Jennifer A.
Cc: Kearney, Thomas; Buchanan, Tom; Jeff Gould; Lane, Thomas Patrick
Subject: RE: Sony v. Cox discovery

Kerry and Jeff,

This is to confirm our understanding of today's meet and confer call. As indicated, we are considering moving on each of these issues tomorrow so we require your response and/or status by 12:00 pm EST tomorrow.

- We provided clarification of RFP 188 and you agreed to look at what you have collected to determine whether there are any responsive, non-privileged documents that have not yet been produced. Have you located responsive documents and will you produce them?
- You stated that producing information from the Sony ATV/EMI database of 17 U.S.C. §§ 203, 304 termination notices would be burdensome. However, it did not appear that you have actually made that inquiry. How can this database be searched? If it can be searched by title or registration number, then Plaintiffs' burden argument seems unfounded given that this information is readily available. You also agreed to check with the other plaintiff groups about whether such a document or database exists.
- We narrowed our request relating to *Grande* deposition transcripts and sealed declarations to only those transcripts and sealed declarations from the *Grande* witnesses who have, or will be, deposed in *Sony*. You said that you would check with your clients on this to determine whether they could be produced.

Regards,

Sean R. Anderson
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-----Original Message-----

From: Kerry Mustico <Kerry@oandzlaw.com>
Sent: Tuesday, June 25, 2019 4:10 PM
To: Anderson, Sean R. <SRanderson@winston.com>; Golinveaux, Jennifer A. <JGolinveaux@winston.com>
Cc: Kearney, Thomas <TKearney@winston.com>; Buchanan, Tom <TBuchana@winston.com>; Jeff Gould <Jeff@oandzlaw.com>; Lane, Thomas Patrick <TLane@winston.com>
Subject: Re: Sony v. Cox discovery

Sean,

I can speak on Thursday morning Pacific time.

Kerry

Kerry M. Mustico
Oppenheim + Zembrak, LLP
202.480.2174 (direct)
kerry@oandzlaw.com

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On 6/25/19, 3:14 PM, "Anderson, Sean R." <SRanderson@winston.com> wrote:

Jeff and Kerry,

I am following up on this. Please confirm whether you are available to meet and confer tomorrow morning between 9 am and 11 am EST, as previous requested.

Thanks,
Sean

Sean R. Anderson

Associate Attorney

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[Winston & Strawn LLP]

On Jun 24, 2019, at 2:33 PM, Anderson, Sean R. <SRanderson@winston.com<<mailto:SRanderson@winston.com>>>> wrote:

Jeff and Kerry,

We need to meet and confer on Plaintiffs' objections to Cox's most recent discovery requests. We are available Wednesday morning from 9 am EST to 11 am EST. Please let us know if there is a brief window during that time period that works for you.

Thanks,
Sean

Sean R. Anderson

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VCard<<http://www.winston.com/vcards/23127.vcf>> | Email<<mailto:sranderson@winston.com>> |
winston.com<<http://www.winston.com>>

<image003.jpg>

From: Kerry Mustico <Kerry@oandzlaw.com<<mailto:Kerry@oandzlaw.com>>>

Sent: Monday, June 17, 2019 11:57 PM

To: Golinveaux, Jennifer A. <JGolinveaux@winston.com<<mailto:JGolinveaux@winston.com>>>; Anderson, Sean R.
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Cc: Kearney, Thomas <TKearney@winston.com<<mailto:TKearney@winston.com>>>; Buchanan, Tom
<TBuchana@winston.com<<mailto:TBuchana@winston.com>>>; Jeff Gould
<Jeff@oandzlaw.com<<mailto:Jeff@oandzlaw.com>>>

Subject: Sony v. Cox discovery

Attached are Plaintiffs' objections to Cox's most recent discovery requests.

Kerry M. Mustico

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